

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

| | | |
|---|---|------------------|
| MALEEHA AHMAD |) | |
| |) | |
| and |) | |
| |) | |
| ALISON DREITH, |) | |
| |) | |
| <i>on behalf of themselves and a class of</i> |) | |
| <i>similarly situated individuals,</i> |) | No. 4:17-cv-2455 |
| |) | |
| Plaintiffs, |) | |
| |) | |
| v. |) | |
| |) | |
| CITY OF ST. LOUIS, MISSOURI, |) | |
| |) | |
| Defendant. |) | |

DECLARATION OF ALISON DREITH

I, Alison Dreith, declare as follows:

1. I am over the age of 18. I am a plaintiff in the above-captioned action. I have personal knowledge of the facts set forth in this declaration and could and would testify competently to those facts if called as a witness.
2. On Friday, September 15, 2017, I drove to downtown St. Louis in order to participate in a protest march following the acquittal of Officer Jason Stockley
3. That morning, I approached downtown from the south, driving up Tucker toward the protest location at Market and Tucker.
4. When I arrived at the intersection of Tucker and Clark, I noticed that police officers and police vehicles had already blocked off Tucker, so I was unable to continue driving north on Tucker.

5. Instead, I turned left on Clark and entered the parking lot behind St. Louis City Hall, where I parked my vehicle.

6. Then I joined the march for approximately one hour before I returned to the intersection of Tucker and Market. I remained there, engaged in expressive activity, for approximately two more hours.

7. At approximately 1 p.m., I had an urgent need to use a restroom.

8. I saw a St. Louis elected official whom I knew personally and asked him to let me in to City Hall to use the restroom. City Hall was locked and chained.

9. The official and I saw many dozens of police officers with bicycles as we walked into City Hall and remarked to each other on the number of officers amassed.

10. The official let me in to City Hall, and I used the restroom.

11. As I left City Hall via the back entrance (facing the Tucker and Clark intersection), I saw a St. Louis Metropolitan police officer standing on the steps of City Hall and using a radio, pointing out protestors and describing what they were wearing.

12. I continued down the steps and through the City Hall parking lot.

13. As I approached Tucker, which was still closed, I saw some police officers pick up their bikes and use them to push people, aggressively.

14. Toward my left, I saw a woman—whom I later learned was Maleeha Ahmad—get sprayed with a chemical directly in the face by a police officer.

15. I was shocked.

16. I had seen no one who posed any threat to any person and had seen no one committing any damage to property.

17. Immediately thereafter and without warning, a St. Louis Metropolitan police officer sprayed me directly in the face with some type of pepper spray.

18. I was committing no crime.

19. No officer had given me any directive.

20. The officer did not warn me that he was about to deploy a chemical agent against me.

21. In fact, I heard no warnings either before I went into City Hall or after I left.

22. The pepper spray burned my eyes and my skin terribly for some 24 hours.

23. The spray left red splotches all over my body.

24. Attached to this declaration is a photograph of me with residue on my skin. I took the photograph after I was able to return to my vehicle.

25. I learned that the St. Louis Metropolitan police deployed chemical agents, including at least pepper spray, pepper balls, and tear gas, without warning at other times over the weekend of September 15, and that they had done so on previous occasions.

26. I learned that the St. Louis Metropolitan police interfered with, and targeted for arrest and abuse, people who were recording video of the police performing their duties.

27. I learned that the St. Louis Metropolitan police were arresting protestors and others for “failing to disperse” or for being part of an “unlawful assembly” in an arbitrary way and without giving warnings that I would be able to understand.

28. What I learned—plus what I experienced on September 15—made me frightened of arbitrary arrest by the St. Louis Metropolitan police, as well as abuse and retaliation for engaging in expressive activity that is critical of the police.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated this 25 day of September, 2017.

By: 
Alison Dreith

